

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

United States, *ex rel.* RICKEY HOWARD,
BRINGING THIS ACTION ON BEHALF
OF THE UNITED STATES OF
AMERICA,

Plaintiffs,

v.

CADDELL CONSTRUCTION
COMPANY, INC., an Alabama
Corporation; W.G. YATES & SONS
CONSTRUCTION COMPANY, a
Mississippi Corporation; JULIAN
MARIE BRESLOW; and DAVID J.
VALDINI & ASSOCIATES, P.A.,

Defendants.

Case No.:7:11-cv-270-H

***INDEX OF EXHIBITS TO RELATOR'S
SECOND AMENDED COMPLAINT***

EXHIBIT No.	DESCRIPTION
1	Solicitation, Offer, and Award for NAVFAC Mid-Atlantic Solicitation Number: N4008508R1404
2	Pompano Masonry base bid to Caddell Yates JV for the masonry subcontract on the Wallace Creek Phase I project
3	Caddell Yates JV cover letter transmitting the draft masonry subcontract to Pompano Masonry
4	February 24, 2009 email informing that Pompano Masonry's attorney (David Valdini) was reviewing the contract
5	Joseph Canitano's email responding that he would be signing the contract
6	Fully executed Pompano Masonry subcontract
7	Clint Bledsoe's email regarding the May draw request
8	Pompano Masonry's Extra Work Order dated May 25, 2009
9	Articles of Organization for Breslow Construction as filed with the Florida Secretary of State
10	Michael Ridgway's June 25, 2009 email transmitting Pompano Masonry's Application for Payment, Draw No. 1, to Joseph Canitano
11	Joseph Canitano's July 17, 2009 email transmitting Pompano Masonry's Application for Payment, Draw No. 2, to Clint Bledsoe

12	Joseph Canitano's July 17, 2009 email to Cleet McHenry
13	Diana McGraw's July 17, 2009 Email to Joe Canitano
14	Valdini's July 21, 2009 letter certifying Breslow Construction's WOSB status
15	Joseph Canitano's email dated July 23, 2009 regarding fee to create Breslow Construction
16	Clint Bledsoe's email dated July 23, 2009 regarding changes to Pompano Masonry subcontract
17	Fully executed Breslow Construction subcontract
18	Corporate email address listings for Breslow Construction and for Pompano Masonry
19	Joe Canitano letter dated September 8, 2009 to Cleet McHenry identifying himself as VP of Breslow Construction
20	Joe Canitano email dated December 7, 2009 to Cleet McHenry identifying himself as VP of Pompano Masonry Corporation
21	John Rawlings email and attachment dated March 23, 2010 forwarded to Dennis Molina at Yates identifying himself as the Corporate Safety Director for both Breslow and Pompano
22	Email from Tonya Tucker to Luis Torres, dated May 20, 2010
23	Email from Mark Smith to Rickey Howard dated September 14, 2010
24	Caddell Yates JV EEOC notification dated June 11, 2010, and Howard's response for Pompano Masonry
25	Broward County, Florida, Property Assessor's records showing parcels owned by Pompano Masonry
26	Series of change orders by Breslow Construction to Pompano Masonry
27	Breslow Construction's 7th draw request
28	Composite exhibit showing that several of these second-tier subcontractors/suppliers were already second-tier subcontractors/suppliers to Pompano Masonry before Breslow Construction was even formed
29	David Valdini's November 12, 2010, letter to Caddell Yates JV
30	Ward & Smith Notice of Default and Claim dated November 19, 2010 to Caddell Yates JV
31	Complaint asserting Breslow Construction's Miller Act Claim against Caddell Yates JV and others
32	Ty McDonough's March 28, 2011 Declaration
33	Caddell Yates JV's Answer to Breslow Construction's Miller Act Claim
34	Miller Act Arbitration Award (relevant pages only)
35	Individual Subcontracting Report dated March 26, 2010
36	Composite exhibit of Individual Subcontracting Reports from October, 2010 – October, 2013
37	Individual Subcontracting Report dated April, 2014

38	Joseph Yates email dated February 24, 2009 to Beth Sanchez and Clint Bledsoe
39	Dick Fitzgibbons email dated April 6, 2009 to Clint Bledsoe, Richard Gurner, Wes Turner, Sid Adams, Stephen Strickland, Cleet McHenry, Tim Plunkett, and Jim Phillips, Sr.
40	April 17, 2009 email chain between Clint Bledsoe, Richard Gurner, Wes Turner, Sid Adams, Stephen Strickland, Cleet McHenry, Tim Plunkett, Jim Phillips, Sr., Del Buck, Doug Potterfield, and Frank Bean
41	April 27, 2009 email from Dick Fitzgibbons to Mark Smith, Cleet McHenry, Clint Bledsoe, Richard Gurner and Wes Turner
42	April 27-28, 2009 email chain between Sid Adams, Del Buck, Clint Bledsoe, Cleet McHenry, Dick Fitzgibbons, Richard Gurner, Wes Turner, Sid Adams, Stephen Strickland, Cleet McHenry, Tim Plunkett, and Jim Phillips, Sr.
43	May 28, 2009 email from Clint Bledsoe to Rick Stratton
44	June 4-5, 2009 email chain between Clint Bledsoe and Eddie Foy
45	June 5, 2009 email from Eddie Foy to Clint Bledsoe
46	June 11, 2009 email chain between Dick Fitzgibbons, Cleet McHenry, Clint Bledsoe, Mark Smith, and Richard Gurner
47	July 16, 2009 email from Clint Bledsoe to Dick Fitzgibbons
48	May 18, 2009 Subcontract from MPi to Baker Roofing
49	June 2, 2009 Subcontract from CYJV to MPi
50	June 5, 2009 letter from MPi to Baker Roofing signed by Tom Newton
51	June 15, 2009 letter from MPi to Precision Walls signed by Tom Newton
52	Check request breakdown for the MPi Business Solutions/McComb Glass payment for 7/16/2010-8/15/2010
53	October 19, 2009 email chain between Lisa Stokes, Amy Smith and Clint Bledsoe
54	Baker Roofing Preliminary Impact Analysis
55	Precision Walls Preliminary Impact Analysis
56	August 3-5, 2009 email chain between Clint Bledsoe, Eddie Foy, Tom Newton and Cleet McHenry
57	August 13, 2009 email chain between Clint Bledsoe, Joey Knoll and Tom Newton
58	May 4, 2010 email chain between Clint Bledsoe and Eddie Foy
59	September 30, 2009 email chain between Clint Bledsoe and Eddie Foy
60	October 12, 2010 email chain between Clint Bledsoe and Dan Hawk
61	August 27, 2010 email from Clint Bledsoe to Cindy Shepherd